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February 22, 2022

By ECF

Honorable Loretta A. Preska
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Dave Alicea v. City of New York, et al.*, 16 Civ. 7347 (LAP): Request for
Enlargement of Time to File Joint Pre-Trial Order

Your Honor:

I am an Assistant Corporation Counsel in the Office of Georgia M. Pestana, Corporation Counsel of the City of New York and the attorney assigned to represent the defendants in the above-referenced action. In that capacity, I write to respectfully request an extension of time of forty-five (45) days from February 24, 2022 to April 11, 2022 to submit the joint pre-trial order currently due on February 24, 2022, for the reasons discussed more fully below. The parties previously requested an extension of time to file their joint pre-trial order on November 19, 2021, which Your Honor granted on November 22, 2021. See Docket Entry Numbers 117, 118. Plaintiff's counsel, Ropes & Gray LLP, consents to this request.

The undersigned requests an enlargement of time because the undersigned has just recently been assigned to this case [Docket Entry Number 119], and is still in the process of familiarizing myself with the facts in this case, as well as the large number of exhibits in this case. See Docket Entry Numbers 91 and 95. The parties conferred via telephone on February 8, 2022 and plaintiff's counsel consents to this request.

Accordingly, defendants respectfully request that the Court extend the time to file the joint pre-trial order.

Thank you for your consideration herein.

SO ORDERED

Loretta A. Preska
LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE

2/23/22

Respectfully submitted,
Joshua Kaufman
Joshua Kaufman
Assistant Corporation Counsel
Special Federal Litigation Division